

MILMAN LABUDA LAW GROUP PLLC
3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

Author: Jamie S. Felsen, Esq - Member
Direct E-Mail Address: jamie@mlaborlaw.com
Direct Dial: (516) 303-1391

December 18, 2023

VIA ECF

Magistrate Judge Steven L. Tiscione
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom N504
Brooklyn, New York 11201

Re: Star Auto Sales of Queens LLC v. Hanie Iskander. *et al.*
Case No.: 1:19-cv-06791-RPK-ST

Dear Magistrate Judge Tiscione:

This firm represents Plaintiff Star Auto Sales of Queens LLC d/b/a Star Subaru ("Plaintiff") in the above-referenced action.

Plaintiff submits this letter in response to Defendant, John Alexander's December 14, 2023 letter requesting dismissal of this case [ECF Doc. No. 102]. The Court has repeatedly rejected Defendants' requests to dismiss the case and Mr. Alexander has provided no basis to dismiss the case at this point.

Mr. Alexander's representations regarding communications with the IRS are inaccurate. On November 9, 2023, I called Mr. Alexander and together we attempted to call the IRS and left a voicemail message. Thereafter, I received a return phone call from an IRS agent and was told to serve a subpoena on the IRS which I did on November 16, 2023. The subpoena was returnable on December 8, 2023, but no response has been received. I left a message today with the IRS regarding the status of the subpoena response.

Mr. Alexander also states that he is not available for tomorrow's conference. Plaintiff does not object to adjourning the conference and proposes rescheduling it for the middle of January so that hopefully by then Plaintiff will have received the response to the subpoena from the IRS.

Respectfully submitted,

/s/ Jamie S. Felsen

cc: Hanie Iskander a/k/a John Alexander (via email: jalexander@myhst.com and john@nvadvertising.net)